

CONTINUATION OF OFF THE RECORD

1. Jeffrey Epstein and Alan Dershowitz have been friends for years. The two met in July, 1996, when Mr. Epstein was introduced to Mr. Dershowitz by a mutual friend and flew on his private jet to Martha's Vineyard to spend the day with Mr. Dershowitz.
2. Mr. Epstein, had grown up in Coney Island. He did not graduate from college.
3. Mr. Epstein was wealthy and owned luxurious houses and private planes and was sometimes accompanied by beautiful women. He had many intellectuals as friends.
4. Mr. Epstein and Mr. Dershowitz quickly found common interests. Mr. Dershowitz has said they talked about science, academia, and Harvard. OUR DISCUSSIONS FOCUSED ON SCIENCE, ACADEMIA AND HARVARD. OUR RELATIONSHIP WAS LARGELY ACADEMIC AND THEN LEGAL
5. In August, 1996, Mr. Epstein invited Mr. Dershowitz to meet Leslie Wexner, whom Mr. Epstein described as his mentor. Mr. Epstein and Mr. Dershowitz took Mr. Epstein's private jet to New Albany, Ohio, where Mr. Wexner had an estate, to attend a party for Mr. Wexner's fifty-ninth birthday. Mr. Dershowitz later said that he was Mr. Epstein's intellectual gift to Mr. Wexner.
6. In the seventies, Mr. Epstein had been a trader and a wealth manager at Bear, Stearns, before leaving in 1981 to start a small firm, J. Epstein & Co.
7. In 1987, Mr. Wexner hired Mr. Epstein as his financial adviser. Mr. Epstein has said that he re- fused to accept clients with less than a billion dollars in assets. The only client that he has ever named publicly is Mr. Wexner. When asked in a deposition whether Mr. Wexner was his only client, Mr. Epstein took the Fifth.
8. In 1989, Mr. Wexner bought a seven-story Manhattan mansion, overlooking the Frick Museum. The mansion was among the largest private residences in the city. Mr. Wexner is reported to have sold it to Mr. Epstein for one dollar. In 1996, Mr. Epstein told the Times that he owned the mansion.

9. In 1997, Mr. Epstein invested thirty million dollars in Boston Provident. Orin Kramer, the founder of the hedge fund, understood that the money came from Mr. Wexner. Later in 1997, Mr. Epstein called Mr. Kramer and asked him to stop by his office. Mr. Dershowitz also attended the meeting. At the meeting, Mr. Epstein asked Mr. Kramer to accept an investment of about half a million dollars from Mr. Dershowitz. Mr. Kramer accepted as a favor to Mr. Epstein. Mr. Dershowitz signed standard papers acknowledging that his money was at significant risk. I NEVER ATTENDED A MEETING WITH KRAMER AND EPSTEIN. I DID INVEST WITH KRAMER. WHEN THE INVESTMENT WENT DOWN, KRAMER CALLED ME AND TOLD ME THAT I WAS THE ONLY ONE OF HIS INVESTORS THAT HADN'T MADE A GREAT DEAL OF MONEY PRIOR TO LOSING, AND THAT HE FELT BAD ABOUT IT, SO HE RETURNED A PORTION OF MY LOSSES. I AM NOT AWARE OF ANY ROLE EPSTEIN MAY HAVE PLAYED IN KRAMER'S DECISION.
10. In 1998, the fund sustained enormous losses. Mr. Epstein told Mr. Kramer that one of the two of them would have to reimburse Mr. Dershowitz. Mr. Epstein said that if he were to have to reimburse Mr. Dershowitz, Mr. Kramer would regret it. Mr. Kramer agreed to restore Mr. Dershowitz's losses, if Mr. Epstein would leave the remainder of the money he controlled in the fund.
11. Mr. Epstein threw parties at his house in New York. He would often invite scientists, whose company he enjoyed.
12. Mr. Epstein also had an interest in Harvard. In 1990, he and Mr. Wexner had helped to fund the construction of a new building at Harvard Hillel, named after Henry Rosovsky, then the Dean of the Faculty of Arts and Sciences.
13. Mr. Dershowitz began introducing Mr. Epstein around the college. Mr. Epstein subsequently began funding research into psychology and the history of science, and he became a member of the advisory board of the Harvard Society of Mind, Brain, and Behavior, and a Harvard fellow. Mr. Epstein also established an office in Brattle Square, where he held seminars on contemporary academic ideas, in which Mr. Dershowitz sometimes participated. I NEVER INTRODUCED EPSTEIN TO ANYONE "AROUND THE COLLEGE". I UNDERSTAND THAT STEPHEN GOULD AND MARVIN MINSKY HAD DONE THAT. TO THE CONTRARY, EPSTEIN INTRODUCED ME TO SEVERAL HARVARD ACADEMICS I HAD NOT PREVIOUSLY MET, SUCH

AS GEORGE CHURCH AND NOWICK. I DID PARTICIPATE IN HIS SEMINARS
ALONG WITH MANY DISTINGUISHED PROFESSORS.

14. In an article in the Harvard Crimson, Mr. Dershowitz said that he would debate mathematics, genetics, law, and psychology with Mr. Epstein and professor Steven Kosslyn, and that in these discussions, they would all cut each other off all the time “because we just get it.” CORRECT.
15. Mr. Epstein would evaluate drafts of Mr. Dershowitz’s books. Mr. Dershowitz has said that Mr. Epstein was the only person outside his family whom he trusted to do this. I DID SEND A FEW OF MY BOOKS TO EPSTEIN IN DRAFT FORM AND HE MADE THOUGHTFUL COMMENTS. I THANKED HIM IN THE ACKNOWLEDGEMENTS.
16. After Lawrence Summers became president of Harvard in 2001, he flew to Palm Beach on Mr. Epstein’s plane and stayed at his mansion. In 2003, Mr. Epstein pledged thirty million dollars to Harvard to create the Epstein Program for Mathematical Biology and Evolutionary Dynamics. To lead it, he recruited Martin Nowak, a biologist from Princeton University. Mr. Dershowitz became a Faculty Affiliate of the program.
17. In January 2007, the evolutionary biologist Robert Trivers was scheduled to receive the Crafoord Prize in biosciences. Mr. Nowak invited him to give a talk at the Epstein Center, followed by dinner. That April, Mr. Trivers sent Mr. Dershowitz a letter that criticized him for what Mr. Trivers viewed as an attack on Norman Finkelstein, and also said that Mr. Dershowitz was a Nazi or Nazi-apologist for his stance on the Israeli-Palestinian conflict.
18. On May 25, the day of his talk, Mr. Nowak, having arrived at Harvard, told Mr. Trivers that he was cancelling the talk a planned celebration, under orders from someone he would not identify. The reason given was that Mr. Trivers had called a Harvard professor a Nazi. Mr. Trivers said that he later learned that the order came from Mr. Epstein, under pressure from Mr. Dershowitz. (Mr. Dershowitz has denied this.) Mr. Trivers said that Mr. Epstein later apologized for having stopped the talk, using the word “apology,” and Mr. Trivers now described them as friendly. In the summer of 2000, according to a deposition by Juan Alessi, who managed Mr. Epstein’s house in Palm Beach, Alessi was driving Ghislaine Maxwell, Mr. Epstein’s girlfriend, to Donald Trump’s Mar-a-Lago

resort, when they saw a girl walking from the main lobby toward the spa. Ms. Maxwell approached the girl, a sixteen year old named [REDACTED], who was reading a book on anatomy and massage therapy. Ms. Maxwell informed her that she knew somebody who was looking for a travelling masseuse. This person was Mr. Epstein.

19. When [REDACTED] was dropped off at the house, there was a big hall table with pictures of young nude girls, mixed in with those of celebrities and politicians. **THESE ALLEGATIONS WERE NEVER TESTED OR VERIFIED UNDER OATH THROUGH CROSS-EXAMINATION.**

20. Ms. Maxwell led [REDACTED] upstairs to a suite where Mr. Epstein was lying, nude, and showed [REDACTED] how to massage him. Ms. Maxwell then took off her clothing, and instructed [REDACTED] to remove her clothing. Ms. Maxwell told [REDACTED] that it was cute that she was wearing children's underwear. Ms. Maxwell then told [REDACTED] to straddle Mr. Epstein, and [REDACTED] and Mr. Epstein had sex. Afterward, Mr. Epstein told [REDACTED] that she "did a really good job," and gave her two hundred dollars. **THESE ALLEGATIONS WERE NEVER TESTED OR VERIFIED UNDER OATH THROUGH CROSS-EXAMINATION.**

21. [REDACTED] returned the next day, at Ms. Maxwell's invitation, and she became a regular presence at the home. She was informed that she was to have sex with Mr. Epstein several times a day, often along with Ms. Maxwell and other girls. She was subsequently told that Mr. Epstein would also be lending her to other men. Ms. Maxwell told her that she was expected to please these men in whatever way they wanted. **THESE ALLEGATIONS WERE NEVER TESTED OR VERIFIED UNDER OATH THROUGH CROSS-EXAMINATION.**

22. Mr. Epstein told [REDACTED] to report back to him about what the men liked. In his New York mansion, Mr. Epstein had also installed a video system that taped every room in the house, which could allow Mr. Epstein to accumulate information to use as leverage against the men. **SHORTLY AFTER I WAS FALSELY ACCUSED IN 2014, I PUBLICALLY STATED THAT I HOPED THERE WERE VIDEOS IN EVERY ROOM IN EPSTEIN'S HOME, BECAUSE THE VIDEOS WOULD SHOW I NEVER DID ANYTHING INAPPROPRIATE. UNFORTUNATELY, THERE ARE NO SUCH CAMERAS IN THE NEW YORK MANSION. THERE WERE CAMERAS INSTALLED ON THE MAIN FLOOR OF MR. EPSTEIN'S PALM BEACH HOME**

TO CATCH SOMEONE STEALING FROM HIM. THE CAMERAS WERE INSTALLED BY THE PALM BEACH POLICE AND THE THIEF TURNED OUT TO BE MR. EPSTEIN'S VALET FOR 10 YEARS, WHO WAS TERMINATED FROM THIS POSITION. THIS IS THE SAME VALET WHO SUBSEQUENTLY GAVE FALSE DEPOSITION TESTIMONY ABOUT ME AND OTHERS IN MR. EPSTEIN'S HOME.

23. Mr. Epstein used the girls under his control to bring in more girls. He preferred young girls from difficult backgrounds who would be in need of money. The women around Mr. Epstein were discouraged from speaking with one another.
24. Mr. Epstein owned nearly a dozen apartments in New York in a building on the Upper East Side, where he kept what were called "semi-permanent" girls. **AGAIN, THESE ARE UNSUBSTANTIATED ALLEGATIONS NEVER TESTED OR VERIFIED UNDER OATH THROUGH CROSS EXAMINATION.**
25. In [REDACTED] case, Mr. Epstein paid her, paid for her apartment, and took her to New York, London, Paris, Tangiers, and his private island. He told [REDACTED] that he was powerful, that he owned the police department, and that he had friends who owed him favors. Mr. Epstein was a donor to the Palm Beach Police Department for years. **AGAIN, THESE ARE UNSUBSTANTIATED ALLEGATIONS NEVER TESTED OR VERIFIED UNDER OATH THROUGH CROSS EXAMINATION.**
26. In 2002, soon after [REDACTED] turned nineteen, Mr. Epstein and Ms. Maxwell sent her to Thailand for a three-week course in massage, and arranged for her to bring back a young girl for Mr. Epstein. **AGAIN, THESE ARE UNSUBSTANTIATED ALLEGATIONS NEVER TESTED OR VERIFIED UNDER OATH THROUGH CROSS EXAMINATION.**
27. In March 2005, a fourteen-year-old girl in Palm Beach described to the police that Mr. Epstein had paid her three-hundred dollars for a massage, told her to take off her clothes, and masturbated. **THE WITNESS REFERRED TO CONFIRMED TO POLICE THAT SHE LIED TO MR. EPSTEIN THAT SHE WAS 18 YEARS OLD, AND WAS TOLD**

THAT IF SHE DID NOT LIE TO MR. EPSTEIN ABOUT BEING 18, SHE WOULD NOT BE ALLOWED IN HIS HOUSE.

28. The police soon began investigating Mr. Epstein for sexually abusing underage girls. The case against Mr. Epstein would involve the testimony of dozens of young girls. Press coverage included a list of famous men who travelled on Mr. Epstein's plane, the so-called Lolita Express, to Little St. James, an island that Mr. Epstein owned in the Caribbean.
29. When Mr. Epstein learned about the investigation, in the fall of 2005, he immediately called Mr. Dershowitz, who established himself in the lead of a team of prominent attorneys from New York, Boston, Washington, D.C., and Miami. I WAS NOT THE LEAD LAWYER. I HELPED ASSEMBLE THE LEGAL TEAM, EACH OF WHOM HAD A DIFFERENT ROLE. I WAS NOT INVOLVED IN ANY INVESTIGATIONS OF FACTUAL MATTERS. I WROTE LEGAL MEMOS AND MET WITH THE STATE ATTORNEY IN PALM BEACH AND MEMBERS OF THE US ATTORNEY'S OFFICE IN MIAMI.
30. Mr. Epstein once likened his offense to that of "a person who steals a bagel."

[Much of the following seven queries involve actions that Mr. Dershowitz performed while representing Mr. Epstein. Can you confirm that they are accurate?] I NEVER HEARD EPSTEIN REFER TO THE ACCUSATION AS COMPARABLE TO A PERSON WHO STEALS A BAGEL. MY UNDERSTANDING IS THAT IT WAS TAKEN OUT OF CONTEXT IN A QUOTE ABOUT THE DIFFERENCE BETWEEN MURDER AND PROSTITUTION.

31. Mr. Dershowitz prepared a dossier featuring entries from Web sites like MySpace, in which Mr. Epstein's alleged victims recounted experiences with alcohol or marijuana and wrote about sex. I NEVER PERSONALLY PREPARED OR DIRECTED THE PREPARATION OF ANY DOSSIERS. I DO NOT OWN A COMPUTER. I NEVER WENT ON ANY WEBSITES. I RELIED ON THE INVESTIGATIVE WORK OF OTHERS IN MY NEGOTIATIONS AND WHERE APPROPRIATE PRESENTED THAT WORK TO THE STATE ATTORNEY.

32. Florida State Attorney Barry Krischer helped Mr. Dershowitz arrange a meeting with Joseph Recarey, the lead investigator in the case. Mr. Dershowitz presented the dossier as evidence that the girls were not of high moral quality. I MET WITH MR. KRISCHER AND PRESENTED APPROPRIATE INVESTIGATIVE MATERIALS TO HIM. HE INVITED MR. RECAREY TO ATTEND A MEETING WE HAD. MY ONLY CONVERSATION WITH MR. RECAREY OCCURRED IN THE BATHROOM WHEN WE TALKED ABOUT OUR COMMON ORIGINS IN NY.
33. Mr. Dershowitz also raised questions about the police. He made a public-records request to the police department for any paper bearing the name of Michael Reiter, the Palm Beach police chief name, and began had private investigators perform background investigations on Mr. Reiter. ENTIRELY FALSE. I NEVER RAISED QUESTIONS ABOUT THE POLICE. I NEVER MADE ANY RECORD SEARCHES. THAT WAS NOT MY ROLE. I NEVER ARRANGED FOR PRIVATE INVESTIGATORS FOR ANY BACKGROUND CHECKS. THAT, TOO, WAS NOT MY ROLE.
34. For months, Mr. Reiter and Mr. Recarey were under constant surveillance, in which cars followed them, their trash was searched, and investigators contacted Mr. Reiter's ex-wife. Mr. Epstein has denied his involvement in this. In 2010, when Mr. Reiter testified about the surveillance, in 2010, Mr. Epstein turned to his lawyer and said, "That wasn't us!" I HAD ABSOLUTELY NO INVOLVEMENT IN ANY SURVEILLANCE, TRASH SEARCHES OR CONTACTS WITH MR. REITER'S EX-WIFE. IT IS MY UNDERSTANDING NO SUCH SURVEILLANCE, SEARCHES OR CONTACT WITH MR. REITER'S WIFE OCCURRED AND THAT THESE ARE THE FABRICATIONS OF PLAINTIFFS' COUNSEL IN PRIOR CIVIL CASES AGAINST MR. EPSTEIN.
35. At one point, Mr. Recarey told Mr. Dershowitz that at least one of the investigators had tried to misrepresent himself to one of the alleged victims as a police officer. Mr. Dershowitz surmised that the woman was someone identified as [REDACTED] in depositions. I HAD NO INVOLVEMENT IN OR KNOWLEDGE OF ANY MISREPRESENTATION. AGAIN, I UNDERSTAND THAT THIS INCIDENT NEVER OCCURRED AND THAT IT WAS ALSO MADE UP BY A PLAINTIFF'S LAWYER.
36. [REDACTED] had alleged that he Mr. Epstein had forcibly penetrated her when she was a minor. She told detectives that in 2003, when she was sixteen, a friend introduced her to Mr.

Epstein. The friend told her that in exchange for a massage she could earn enough money for a camping trip in [REDACTED] that she wanted to go on. [REDACTED] said that she returned to Mr. Epstein's house hundreds of times, becoming his Mr. Epstein's favorite. She said that she sometimes had non-penetrative sex with Mr. Epstein and one of his "semi-permanent" girls, [REDACTED], whom Mr. Epstein was said to have bought from her parents in Yugoslavia when she was about fifteen. [REDACTED] said that Mr. Epstein would take naked photographs of her and other girls and display the photographs in the house.

37. In a letter to Mr. Recarey, Mr. Dershowitz enclosed snippets gathered from [REDACTED]'s presence on social media. Mr. Dershowitz noted that [REDACTED] chose to go by the nickname "pimp juice," and he noted that [REDACTED] appeared to have a fascination with marijuana. Mr. Dershowitz said that the two investigators who tried to speak with her were instructed beforehand to take notes, out of fear that she was an accomplished drama student, who, Mr. Dershowitz said, had misled others in the past and might try to do the same with the investigators. Mr. Dershowitz suggested that [REDACTED] motivation was money, to be "really rich." IN MY NEGOTIATIONS WITH THE STATE ATTORNEY AND THE POLICE I FORWARDED TO THEM THE RESEARCH DONE BY INVESTIGATORS. I DID NOT HIRE OR DIRECT ANY INVESTIGATORS. IN MY ROLE AS EPSTEIN'S ATTORNEY, IT WAS MY DUTY TO FORWARD ANY EXCULPATORY INFORMATION TO THE PROSECUTORS AND POLICE.
38. In July 2006, Krischer, charged Mr. Epstein with one count of aggravated assault. There was no mention of underage girls, nor a requirement to register as a sex offender, nor a threat of jail time. IT WAS NOT KRISCHER WHO CHARGED MR. EPSTEIN. IT WAS THE PALM BEACH COUNTY GRAND JURY THAT INDICTED MR. EPSTEIN ON ONE COUNT OF FELONY SOLICITATION OF PROSTITUTION. HE WAS NEVER CHARGED WITH A COUNT OF AGGRAVATED ASSAULT.
39. In 2007, Mr. Epstein argued that he was being persecuted because he was Jewish. Lawyers for Mr. Epstein said that he was being unjustly targeted because of his wealth. I NEVER HEARD EPSTEIN SAY HE WAS PROSECUTED BECAUSE HE WAS JEWISH.
40. In the fall of 2007, Mr. Epstein's legal team negotiated a non-prosecution agreement, in which the federal government would throw out its indictment if Mr. Epstein pleaded to two state felony charges, solicitation of prostitution and procuring minors for prostitution.

Mr. Epstein would also register as a sex offender and pay lawyers' fees for the victims who sued him. The agreement also contained a clause that protected four of Mr. Epstein's assistants, including [REDACTED], from prosecution. In the final days of the negotiations, an unusual provision was added that guaranteed immunity for "any potential co-conspirators." I HAD NO INVOLVEMENT IN NEGOTIATING THE PROVISION, OR GRANTING IMMUNITY TO ANY "CO-CONSPIRATORS". I HAD NO INTEREST IN THAT PROVISION, SINCE I WAS NOT A CO-CONSPIRATOR. IF ANYONE IN THE GOVERNMENT THOUGHT THAT I WAS, THEY SURELY WOULDN'T HAVE ALLOWED ME TO PARTICIPATE IN THE NEGOTIATIONS. IT IS MY UNDERSTANDING THAT THE PROVISION WAS MEANT TO PROTECT JANE DOES THAT MAY HAVE HAD EXPOSURE FOR BRINGING THEIR FRIENDS TO MR. EPSTEIN'S HOME.

41. Afterward, over nine months, Mr. Dershowitz and his team investigated prosecutors and their families, attempting to disqualify them, in order to prove the prosecution was tainted. The U.S. Attorney rejected these attempts. When officials at the Justice Department ruled that the charges offered by Mr. Dershowitz's team were baseless, Mr. Dershowitz's team went to more senior officials. Can you confirm that this description is accurate? I WAS NOT AWARE OF ANY INVESTIGATIONS OF PROSECUTORS AND THEIR FAMILIES AND I WAS NOT INVOLVED IN ANY SUCH INVESTIGATIONS. IF THERE WERE ANY, I WOULD HAVE THOROUGHLY DISAPPROVED OF ANY SUCH INVESTIGATION. CALLING EPSTEIN'S LEGAL TEAM THE "DERSHOWITZ TEAM" IS FALSE AND MISLEADING. I PLAYED A ROLE IN THE TEAM, BUT MY ROLE WAS LARGELY TO PROVIDE LEGAL RESEARCH AND TO NEGOTIATE. I WAS NOT INVOLVED IN ANY MONETARY OR CIVIL ASPECTS OF THE SETTLEMENT, OR IN ANY INVESTIGATIONS.
42. On June 30, 2008, with every alternative exhausted, Mr. Epstein pleaded guilty. He was given an eighteen-month sentence in a county jail, and allowed to depart every day, on work release, for an office that he had acquired nearby. At the office, Mr. Epstein received visitors, and a policeman served them coffee. Mr. Epstein told a friend that he was reading "De Profundis" in prison. Mr. Epstein was released after thirteen months.
43. In 2007, Ms. Maxwell called [REDACTED], who was living outside of Sydney. Ms. Maxwell told [REDACTED] that Mr. Epstein was being investigated, and that if [REDACTED] refused to cooperate, she'd be "taken care of." [REDACTED] told Ms. Maxwell that she

wouldn't speak to anyone, but she declined compensation. A few days later, Mr. Epstein and his lawyer called to hear directly from her that she wouldn't be speaking to anyone.

44. In May 2009, [REDACTED] sued Mr. Epstein, a [REDACTED]. In her complaint, [REDACTED] stated that she had been sexually abused by Mr. Epstein and also was "required to be sexually exploited by Mr. Epstein's friends, including royalty, politicians, academicians, businessmen.

45. Mr. Epstein eventually settled her suit, and those of many other victims.

46. In December, 2014, [REDACTED] filed a motion to join a suit attempting to overturn the non-prosecution agreement. She claimed that Mr. Epstein had abused her, and had trafficked her to powerful friends as a way of gaining influence over them. In her motion, she named three men: Jean Luc Brunel; Prince Andrew, the Duke of York; and Mr. Dershowitz. She said that she had sex with Mr. Dershowitz at least six times, in Mr. Epstein's various residences, on his private island, in a car, and on his plane. [REDACTED] has also said that Mr. Epstein trafficked other girls. THE MOTION NAMING ME AS SOMEONE WHOM [REDACTED] HAD SEX WITH IS ENTIRELY FALSE. I NEVER MET HER. THE JUDGE STRUCK ALL REFERENCES TO ME. HER LAWYERS WITHDREW HER AFFIDAVIT AS PART OF A SETTLEMENT. SHE ALSO SAID SHE HAD SEX WITH MANY FAMOUS PEOPLE, INCLUDING RENOWNED BUSINESS LEADERS, HEADS OF STATE AND FOREIGN DIGNITARIES. BUT BEFORE SHE MET HER LAWYERS SHE NEVER INCLUDED ME IN ANY SUCH LIST, INDEED, SHE SPECIFICALLY EXCLUDED ME, DESPITE A SUGGESTION FROM SHARON CHURCHER TO FALSELY INCLUDE ME, IN HER BOOK MANUSCRIPT.

47. A British-South African woman named [REDACTED] has also accused Mr. Epstein in a lawsuit of involving her in a sex-trafficking ring.

48. [REDACTED] said that in September, 2006, when she was twenty-two and recently arrived in New York, a new friend introduced her to Mr. Epstein, describing him as a philanthropist who used his wealth and connections to help poor young women in exchange for massages. [REDACTED] said that Mr. Epstein paid the friend five-thousand dollars in exchange for bringing [REDACTED] to him.

49. After the massages turned sexual, [REDACTED] was allowed to live in a large apartment in Mr. Epstein's building on the Upper East Side. She was also given a cell phone, car service, and money for living expenses. Mr. Epstein invited her to fly to his island, which she did several times in late 2006 and early 2007. Mr. Epstein and Ms. Maxwell told [REDACTED] they could help arrange her admission at the Fashion Institute of Technology, where she dreamed of studying.
50. [REDACTED] was told that if she refused to have sex with Mr. Epstein and his associates, her apartment would be taken away, and Mr. Epstein would make sure that she couldn't go to college or get a job. Mr. Epstein told [REDACTED], who weighed about 125 pounds, that he wanted her to weigh 114. One night on Little St. James, Mr. Epstein took away [REDACTED] food and announced to other guests that if she didn't lose weight, she would have to move out.
51. In an affidavit, [REDACTED] said she spent significant time with Mr. Epstein in New York and that Mr. Epstein lent her out to friends and associates, including Mr. Dershowitz, at Mr. Epstein's townhouse. [REDACTED] described visiting Little St. James repeatedly, in order to have sex with Mr. Epstein, Ms. [REDACTED], and other girls and guests.
52. Last December, [REDACTED] suit was settled in her favor. Mr. Epstein paid her an undisclosed sum.
53. As part of the court proceedings, a lawyer for Ms. Maxwell mentioned that Mr. Dershowitz was one of several people [REDACTED] alleged Mr. Epstein had directed her to have sex with. **I NEVER MET OR HEARD OF [REDACTED]. ANY ALLEGATION THAT SHE HAD SEX WITH ME IS FALSE AND PERJURIOUS. MS. MAXWELL'S LAWYER VIOLATED THE SEAL BY DISCLOSING HER FALSE ALLEGATION AGAINST ME.**

[The remainder of the queries involve allegations concerning Mr. Dershowitz but that also involve Mr. Epstein, that I would therefore like to verify with Mr. Epstein.]

54. [REDACTED] met Mr. Dershowitz in a brief encounter at Mr. Epstein's mansion in New York. After that, Mr. Dershowitz was seen with Mr. Epstein often. After some time, Mr. Epstein let Mr. Dershowitz use his bedroom, something that Mr. Epstein rarely, if ever,

did for another man. Once, after [REDACTED] had sex with Mr. Epstein, Mr. Epstein walked out of his bedroom and Mr. Dershowitz entered and had sex with [REDACTED]. Can Mr. Epstein verify that this description is accurate? **EVERYTHING IN #55 IS TOTALLY FALSE. I DID NOT MEET [REDACTED] IN A BRIEF ENCOUNTER OR ANY OTHER ENCOUNTER. I HAVE NEVER EVEN SEEN EPSTEIN'S BEDROOM. HE CERTAINLY NEVER LET ME USE IT. I HAVE MY OWN APARTMENT IN NYC. I NEVER HAD SEX WITH [REDACTED] IN EPSTEIN'S BEDROOM OR ANYWHERE ELSE.**

55. Mr. Dershowitz visited Mr. Epstein's Palm Beach home four or five times a year, and typically stayed for two or three days. On one occasion, several girls, who were nude, were having lunch at the pool, and Mr. Dershowitz was also present. [REDACTED] said that she was made to give Mr. Dershowitz a massage and to tend to him. [REDACTED] also gave Mr. Dershowitz a massage on the beach at Little St. James and then went with him to one of the beach bungalows, which were just large enough to hold a bed, where she was made to have sex with him. Can Mr. Epstein verify that this description is accurate? **ENTIRELY FALSE. I VISITED EPSTEIN'S PALM BEACH HOME ON SEVERAL OCCASSIONS. ONCE WITH MY NEPHEW WHEN WE ATTENDED THE LAUNCH OF A SPACE SATELLITE. ONCE WITH MY RESEARCH ASSISTANT, MITCH WEBBER, WHEN WE WERE WORKING ON EPSTEIN'S CASE; ONCE WITH MY WIFE, CHILDREN, GRANDCHILDREN AND DAUGHTER IN LAW WHEN WE STAYED THERE FOR 4-5 DAYS DURING CHRISTMAS VACATION WHEN EPSTEIN WAS AWAY; AND ON PERHAPS ANOTHER HALF DOZEN OR SO OCCASSIONS, TO MEET WITH EPSTEIN PROFESSIONALLY OR ACADEMICALLY. I WAS NEVER AT HIS HOME DURING THE PERIOD OF TIME WHEN HE KNEW [REDACTED]. I NEVER SAW A NUDE PERSON AT HIS HOME OR AROUND THE POOL. THE ONLY PEOPLE I EVER SAW AT HIS HOME WERE HIS STAFF, GHISLAINE MAXWELL, HIS ASSISTANT [REDACTED], HIS 20-SOMETHING YEAR OLD GIRLFRIEND AND SOME BUSINESS ACQUAINTANCES. I NEVER SAW ANYBODY CLOSE TO UNDER-AGE. I NEVER SAW A NUDE PICTURE, EXCEPT FOR AN OLD SEPIA PRINT IN HIS ENTRANCE WAY OF A MODEL WHO HAD POSED FOR THE ARTIST RODIN, AND NEXT TO IT A PHOTO OF HER AS AN OLDER WOMAN. I NEVER RECEIVED A MASSAGE FROM [REDACTED] OR ANY OTHER YOUNG WOMAN. THE ONLY MASSAGE I EVER RECEIVED WAS FROM AN OLDER RUSSIAN WOMAN WHO WANTED TO PUT HER KNEES ON MY SHOULDERS. I REFUSED. I CALLED MY WIFE AFTER THIS EXPERIENCE AND TOLD HER I**

WOULD NEVER GET ANOTHER MASSAGE AT EPSTEIN'S HOUSE. I NEVER RECEIVED A MASSAGE FROM [REDACTED] ON THE BEACH AT LITTLE ST. JAMES. THE ONLY TIME I WAS AT LITTLE ST JAMES WAS WELL BEFORE [REDACTED] MET EPSTEIN. I WAS THERE WITH MY WIFE AND DAUGHTER ON THE WAY BACK FROM A VACATION ON A NEARBY ISLAND. WE SPENT ONE NIGHT TOGETHER IN A LITTLE COTTAGE. WE HAD DINNER WITH PROFESSOR MICHAEL PORTER, HIS WIFE AND 2 OF HIS RELATIVES. EPSTEIN HAD RECENTLY BOUGHT THE ISLAND AND THE ONLY PEOPLE ON IT WERE EPSTEIN, GHISLAINE MAXWELL AND 1 -2 STAFF MEMBERS.

56. Mr. Dershowitz has said that he received a massage at Mr. Epstein's house in Palm Beach—though he has said that [REDACTED] wasn't the masseuse and he kept his underwear on. Can Mr. Epstein verify that this account is accurate? CORRECT

57. Several months after meeting Mr. Epstein, [REDACTED] went to Miami for the weekend. When she returned, she told Mr. Epstein that she had met a man, who, with a friend, had attempted to rape her. Mr. Epstein told her that he would introduce her to one of his best lawyers, and he later introduced her to Mr. Dershowitz. Mr. Epstein and Mr. Dershowitz argued, successfully, against her going to the police, and Mr. Dershowitz told her that he would represent her. [REDACTED] did not know of the investigation into Mr. Epstein, or that Mr. Dershowitz was representing him. ENTIRELY FALSE AND MADE UP. I NEVER MET [REDACTED], I NEVER REPRESENTED HER. I NEVER HAD ANY DISCUSSION WITH HER ABOUT ANY CASE. I NEVER SIGNED A RETAINER AGREEMENT. I NEVER ENTERED AN APPEARANCE IN COURT. I AM NOT A MEMBER OF THE NY BAR AND I AM NOT AUTHORIZED TO PRACTICE LAW THERE, EXCEPT UNDER THE AUSPICES OF LOCAL COUNSEL

58. Shortly afterward, [REDACTED] had dinner with Mr. Epstein and Mr. Dershowitz to talk about her case. When [REDACTED] asked how the case was proceeding, Mr. Dershowitz said little. Can Mr. Epstein verify that this description is accurate? COMPLETELY FALSE. I NEVER HAD DINNER WITH [REDACTED]. I NEVER DISCUSSED ANY CASE WITH [REDACTED]. THERE WAS NO CASE, AS FAR AS I KNOW. DO [REDACTED] OR HER LAWYERS CLAIM THERE IS ANY RECORD OF ANY SUCH CASE? THERE WAS NEVER ANY LEGAL RELATIONSHIP OR ANY OTHER RELATIONSHIP WITH [REDACTED]. [REDACTED] HAS WRITTEN OVER 100 EMAILS TO A POST REPORTER NAMED MAUREEN CALLAHAN IN WHICH

SHE CLAIMS TO HAVE SEX TAPES OF DONALD TRUMP, BILL AND HILLARY CLINTON, BILL RICHARDSON, RICHARD BRANSON. SHE ALSO CLAIMS TO HAVE HAD SEXUAL RELATIONS WITH MANY PROMINENT PEOPLE, BUT IN HER EMAILS SHE NEVER MENTIONS ME AS ONE OF THE PEOPLE WITH WHOM SHE HAD SEX. YOU CAN CONFIRM ALL OF THIS WITH MS. CALLAHAN, WHO HAS THE EMAILS AND IS FREE TO SEND THEM TO YOU. I, TOO, HAVE THE EMAILS, BUT THEY ARE SEALED. YOU CAN ASK [REDACTED] LAWYERS TO SHOW YOU THE EMAILS. THEY WOULD BE AUTHORIZED. HOPEFULLY, THESE EMAILS WILL BE AMONG THOSE UNSEALED BY THE SECOND CIRCUIT. IF YOU MENTION THE [REDACTED] ACCUSATIONS AGAINST ME YOU ARE OBLIGATED TO MENTION HER CLAIM THAT SHE HAS SEX TAPES OF THE PRESIDENT, THE FORMER PRESIDENT AND THE FORMER PRESIDENTIAL CANDIDATE. TO OMIT THAT CRUCIAL FACT WOULD BE A DEFAMATORY HALF TRUTH.

59. Several weeks after the dinner, was called to Mr. Epstein's mansion early one evening. Mr. Epstein, Mr. Dershowitz, and Ms. [REDACTED] were present. There Ms. [REDACTED] took [REDACTED] upstairs. In the room, Ms. [REDACTED] undressed [REDACTED]. Mr. Dershowitz then walked in, undressed, and the three engaged in a sexual encounter, in which Mr. Dershowitz didn't penetrate [REDACTED], but she was forced to perform oral sex on him and masturbate him. Can Mr. Epstein verify that this description is accurate? COMPLETELY FALSE AND MADE UP. I WAS NEVER IN EPSTEIN'S BEDROOM. AND I NEVER ENGAGED IN A SEXUAL ENCOUNTER WITH EITHER [REDACTED] OR [REDACTED]. THE STORY IS COMPLETELY MADE UP. MY UNDERSTANDING IS THAT THE FALSE [REDACTED] ACCUSATIONS HAVE BEEN SEALED BY THE JUDGE. WE ARE TRYING TO GET EVERYTHING UNSEALED, BUT AT THE MOMENT IT REMAINS UNDER SEAL. IF THIS INFORMATION WAS GIVEN TO YOU BY [REDACTED] LAWYER, THEY MAY HAVE VIOLATED THE SEALING ORDER.
60. Can you confirm that Mr. Dershowitz has been Mr. Epstein's lawyer, without interruption, since the police investigation began in 2005? I BECAME EPSTEIN'S LAWYER SHORTLY AFTER THE INVESTIGATION BEGAN.
61. Mr. Dershowitz has said that he, Mr. Epstein, and Ms. Maxwell had a joint defense agreement in this case, which would mean that Mr. Dershowitz's conversations with Ms.

Maxwell are subject to attorney-client privilege. Does this description look accurate? I DO NOT BELIEVE THAT I HAVE A JOINT DEFENSE AGREEMENT WITH MS. MAXWELL. AT ONE POINT WE DISCUSSED IT BUT WE DID NOT AGREE.

62. When Mr. Dershowitz was asked if he was still in touch with Mr. Epstein, he said that he doesn't represent Mr. Epstein, and then said that one never stops being someone's lawyer, and that he'd always take Mr. Epstein's call. Can Mr. Epstein confirm?
CORRECT

PLEASE NOTE THAT THE ENTIRE THRUST OF YOUR PROPOSED ARTICLE DEPENDS ON THE UNCORROBORATED CREDABILITY OF 2 WOMEN WITH LONG AND PROVABLE RECORDS OF LYING AND COMMITTING PERJURY AGAINST FAMOUS PEOPLE. IF THEY ARE LYING – AS THE EVIDENCE PROVES THEY ARE – YOUR ENTIRE THESIS CRUMBLES IN THE DUST. YOU ARE DISSEMINATING TOTALLY FALSE INFORMATION AGAINST AN ENTIRELY INNOCENT MAN WHO NEVER EVEN MET THE WOMEN WHO ARE FALSELY ACCUSING HIM.